

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

**LINDA M. LESLIE, Regional Director of  
the Third Region of the National Labor  
Relations BOARD, for and on behalf of the  
NATIONAL LABOR RELATIONS  
BOARD**

**No. 1:22-cv-00478-JLS**

**Petitioner,**

**vs.**

**STARBUCKS CORPORATION,**

**Respondent.**

**WORKERS UNITED’S STATUS REPORT**

Movant / amicus curiae Workers United (“Union”) does not take a position on Petitioner’s Motion for Extension of Time Pursuant to FRAP 4(a)(5)(A) (Dkt. 77). However, given an issue Starbucks raised in its response to the Motion (Dkt. 82) and in its response to the Union’s Status Report (Dkt. 83), the Union makes this submission. In opposing requests by Petitioner and the Union, Starbucks argues it might be prejudiced by the documents it seeks being destroyed or being otherwise subject to spoliation. The point is without merit. The undersigned counsel, who represents the Union and the twenty-one individual recipients of the subpoenas, has advised all the recipients to preserve any documents that might be responsive to the requests of all twenty-two subpoenas, while the parties resolve disagreements about the protected nature of the documents.

Respectfully submitted,

  
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Ian Hayes, Esq.

Cc: Alicia Pender Stanley, Esq, via ECF and electronic mail  
Adam Paul Tuzzo, Esq., via ECF and electronic mail  
Jacqueline Phipps Polito, Esq., via ECF and electronic mail  
Jonathan O. Levine, Esq., via ECF and electronic mail  
David A. Kadela, Esq., via ECF and electronic mail  
Jeffrey S. Hiller, Esq., via ECF and electronic mail  
Brittany L. Stepp, Esq., via ECF and electronic mail

**CERTIFICATE OF SERVICE**

I certify that on January 4, 2023, the foregoing document and attachment have been electronically filed with the Clerk of the Court using the CM/ECF system. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Ian Hayes

Ian Hayes